



United States  
Department of  
Agriculture

Food Safety  
and Inspection  
Service

Washington, D.C.  
20250

Dr. Robert A. Bell  
Head of Veterinary International Trade  
Ministry of Agriculture, Fisheries & Food (MAFF)  
State Veterinary Service  
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FEB 20 2001

Dear Dr. Bell:

Thank you for your letter of November 22, 2000, providing comments to the Food Safety and Inspection Service's (FSIS) draft report of FSIS' May 3-25, 2000, audit of England's meat and poultry inspection. Enclosed is a copy of the final audit report, of which we included your November letter as an addendum. We appreciate MAFF's quick attention to the deficiencies identified in the August 24, 2000, draft final report and the assurances that corrective actions have been taken.

Regarding the issues and questions addressed in your November letter, we hope the following responses provide adequate clarification.

1. Intra-laboratory Check Sample Program

FSIS requires *each* laboratory analyst conducting tests for residue compounds to participate in a *monthly* intra-laboratory check sample program. It is possible that the Food Analysis Performance Assessment Scheme (FAPAS) you identified in your letter complies with this requirement. However, to make an equivalence determination, we request that you provide us with a copy of the FAPAS procedures and advise us when you anticipate implementation of this program.

2. Submission of Laboratory Test Results

FSIS requires the results of laboratory analyses to be submitted to government, officials within 10 working days from the date the samples were taken. A timely review of laboratory test results enhances FSIS' ability to quickly identify and act upon potential problems concerning animals and animal products with residue violations. UK's National Residue Surveillance Scheme, which provides for a fast-track system to monitor animals suspected of residue violations, appears to satisfy FSIS' requirements.

### 3. Species Verification

FSIS acknowledges receipt of UK's April 14, 2000 letter requesting an exemption from routine species testing of fresh and cooked products produced for export to the United States. We are currently reviewing this request along with those from other countries exporting meat and/or poultry to the United States, and we hope to complete the review process in the near future. Meanwhile, the UK should continue species verification testing for product exported to the United States until an exemption is granted.

### 4. Monthly Supervisory Visits at Cold Storage Facilities

FSIS regulations [9 CFR 327.2(a)(2)(iv)(A)] require monthly supervisory visits by a foreign inspection official to each establishment certified to export their products to the United States. This includes cold storage facilities, such as UK establishment 2205, whose business activities could be limited to storing products. In the United States, cold storage facilities handling federally inspected product must meet FSIS requirements. UK establishment 2205 is certified by MAFF to export products to the United States and therefore must be subject to monthly reviews by foreign inspection officials. However, these monthly reviews are not required when UK 2205 or any other certified establishment is not actively exporting their products to the United States.

### 5. Generic *Escherichia coli* (*E.coli*) and *Salmonella* Testing

In accordance with FSIS regulations 9 CFR 310.25 and 381.94, slaughter establishments are subject to both generic *E.coli* and *Salmonella* testing while establishments producing ground beef are subject to only *Salmonella* testing. However, in addition to this requirement, FSIS also requires establishments producing ground beef to conduct routine testing of raw ground beef products for *E.coli* O157:H7 or require their suppliers of boneless beef to certify that each lot received has been tested and found negative for *E.coli* O157:H7. FSIS has a zero tolerance for *E.coli* O157:H7 in ground beef products.

### 6. Frequency for *Salmonella* Sampling Sets at UK Establishment 2060

FSIS does not establish the rate of frequency at which *Salmonella* sampling sets are determined by the foreign government inspection system. FSIS regulation, 9 CFR 310.25(b), states that the sampling and testing of raw products in individual establishments are on an unannounced basis and the frequency and timing of such sampling/testing are based upon the establishment's previous test results and other information concerning an establishment's performance. Accordingly, FSIS requires the foreign government to determine this frequency. However, FSIS would recommend, as a minimum, a frequency of one sampling set per year as a starting basis.

I have enclosed copies of the FSIS regulations cited in this letter. If you have any questions regarding the final audit report or our responses to the issues/questions addressed in your November letter, please contact me at telephone number 202-720-3781, fax number 202-720-7990, or email address ([sally.stratmoen@usda.gov](mailto:sally.stratmoen@usda.gov)).

Sincerely,

A handwritten signature in cursive script that reads "Sally Stratmoen". The signature is written in dark ink and is positioned above the typed name and title.

Sally Stratmoen, Acting Director  
International Policy Staff  
Office of Policy, Program Development  
and Evaluation